

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAUREN BIANCHI,)	
)	
Plaintiff,)	Case No.: 1:21-cv-04446
)	
v.)	Removed from:
)	
RADIUS GLOBAL SOLUTIONS, LLC,)	Cook County
)	Circuit Court, Chancery Division
Defendant.)	Case No.: 2021 CH 03530

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Radius Global Solutions, LLC (hereinafter “Defendant”), by its attorneys, respectfully files this Notice of Removal to remove this action from the Circuit Court of Cook County, Chancery Division in Cook County, Illinois, to the United States District Court for the Northern District of Illinois. In support of this Notice of Removal, Defendant states as follows:

1. Plaintiff, Lauren Bianchi, originally commenced this action by filing a complaint against Radius in the Cook County Circuit Court, Chancery Division, captioned *Lauren Bianchi v. Radius Global Solutions, LLC, Case No.: 2021 CH 03530*, on July 20, 2021. The complaint was served on Radius’ registered agent on July 23, 2021. A true and correct copy of the complaint is attached hereto as Exhibit A. No further proceedings before the state court have occurred.

2. For the reasons described below, this Court has jurisdiction over the state court action pursuant to 28 U.S.C. § 1331 because plaintiff's complaint alleges a cause of action arising under the laws of the United States.

3. Plaintiff's complaint alleges that Radius violated the Federal Debt Collection Practices Act due to Radius' allegedly unlawful collection activities concerning a debt which was owed by the Plaintiff.

4. The United States Supreme Court has affirmed that federal question jurisdiction exists when presented with a substantial federal question. *Grable & Sons Metal Prods., Inc. v. Darue Eng. & Mfg.*, 545 U.S. 308 (2005). Because plaintiff seeks relief for a cause of action arising under a federal statute, the complaint asserts a federal question under 28 U.S.C. § 1331 and 15 U.S.C. § 1692k, and it is therefore removable pursuant to 28 U.S.C. § 1441.

5. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b) in that it is being filed within thirty (30) days after service of the complaint on Radius. Radius was served on July 23, 2021. *See* Exhibit B (state court docket).

6. The Cook County Circuit Court, Chancery Division is located within the federal Northern District of Illinois. Therefore, venue for purposes of removal is proper because the United States District Court for the Northern District of Illinois embraces the place in which the removed action was pending. 28 U.S.C. § 1441(a).

7. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal is being caused to be served on plaintiff, through her attorneys, at the address provided in the

complaint. Notice will also be promptly filed with the clerk of the Cook County Circuit Court, Chancery Division.

8. Radius files this Notice of Removal solely for the purpose of removing the state court action and does not waive, and specifically reserve, all defenses.

WHEREFORE, Defendant Radius Global Solutions, LLC gives notice that this action is removed to the United States District Court for the Northern District of Illinois, and respectfully requests that no further proceedings in this matter be had in the Cook County Circuit Court, Chancery Division.

Date: August 20, 2021

Respectfully submitted,

s/ Andrew E. Cunningham

Andrew E. Cunningham

Morgan I. Marcus

Sessions, Israel & Shartle, LLC

141 West Jackson Boulevard, Suite 3550

Chicago, Illinois 60604

Telephone: (312) 578-0992

E-mail: acunningham@sessions.legal

mmarcus@sessions.legal

Attorneys for Defendant

Radius Global Solutions, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 20, 2021, I electronically filed the foregoing **Notice of Removal** with the Clerk of Court using the CM/ECF system. A copy of this document and all attachments are being delivered by electronic mail to plaintiff's counsel at the following address:

Julie Clark
Samuel Park
Edelman, Combs, Lattuner, & Goodwin, LLC
20 South Clark Street, Suite 1500
Chicago, IL 60603
Ph: (312) 739-4200
jclark@edcombs.com
spark@edcombs.com

s/ Andrew E. Cunningham
Andrew E. Cunningham, Esq.

Attorney for Defendant
Radius Global Solutions, LLC